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Project
Flyway Property
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Mr. Christiansen,

On behalf of Robert Marriam (Remedium Group, Inc.), W.R. Grace + Co., FAXED is three (3) pages of the SAP we are waiting on. Sections 5.2.1, 5.2.2, 5.2.3, and 5.2.4 describe the proposed confirmatory soil sampling for four different categories. Please review, and let us know if the concept of the soil confirmation sampling program is correct. Thank you. If you have any questions, please call Robert Marriam at 901-820-2023 or me at 215-295-2400.

Drew Gould

Section 5
Asbestos in Soil Confirmation Sampling Program, Rationale, and Locations

5.1 Initial Work Efforts

The initial work efforts will include:

- Resurvey the fifty-three (53) grid areas to establish each 100-ft. x 100-ft. grid.
- EPA's soil data will be reviewed to establish the "appropriate category" for each 100-ft. x 100-ft. grid. See below for a list of each category.
- A 100-ft. x 100-ft. grid area map will be generated to identify the "category" for each 100-ft. x 100-ft. grid. This map will be used to implement the appropriate action in each area.

5.1.1 Category List

- No asbestos detected in the samples and no substantial visual vermiculite present.
- No asbestos detected in the samples but substantial visual vermiculite is present. to define
- Asbestos is present in the samples at greater than 1%. trace
- Asbestos was detected in the samples at less than 1% in the 0-18-inch depth interval. trace

5.2 Plan of Action for Each Category

A plan of action will be determined for each 100-ft. x 100-ft. grid area. The plan of action for each category is described below. Is this pre- or post- excavation?

5.2.1 No Asbestos Identified in the Samples and No Substantial Visual Vermiculite Present

No action will be required in this 100-ft. x 100-ft. grid area.

5.2.2 No Asbestos Identified in the Samples But Substantial Visual Vermiculite is Present

Three (3) inches of soil will be removed (scraped) and the excavation will be visually inspected. If substantial vermiculite is still present, an additional 3-inches of soil will be removed. At this point, confirmatory soil samples will be collected. Depending on the soil sample results, the goal is to have non-detect sample readings from the 0-18-inch depth interval. If required, based on the soil sample results, the goal is to have less than 1% asbestos deeper than 18-inches to a maximum depth of 4-feet, if required.

5.2.3 Asbestos is Present in the Samples at Greater than 1%

Eighteen (18) inches of soil will be removed in this grid area. After the soil is excavated, confirmatory soil samples will be collected. Depending on the soil sample results, additional soil will be removed from 6-inch intervals, followed by confirmatory soil samples. The depth of the excavation will not exceed 4-feet. The goal is to have less than 1% asbestos from the confirmatory soil samples.

5.2.4 Asbestos Was Detected in the Samples at Less Than 1% in the 0-18 Inch Depth Interval

If the sample that contained less than 1% asbestos is at the surface, 0-6 inches of soil will be removed and confirmatory samples collected. This will be repeated, if necessary, to achieve a goal of non-detect asbestos in the 0-18-inch depth interval.

If the soil samples that contained less than 1% asbestos are for a soil sample collected at depth, soil will be removed to that depth and confirmatory samples collected. The goal is to have non-detect asbestos in the 0-18-inch depth interval. If the confirmatory soil samples show greater than 1% asbestos at 18-inch, additional soil will be removed (6-inch intervals) and confirmatory soil samples will be collected. The depth of the excavation will not exceed 4-feet.

5.3 Confirmation Soil Sample Procedures

Each 100 ft. x 100 ft. grids will be subdivided into 20 ft. x 20 ft. subgrids (see Figure ____). A composite soil sample will be collected from five adjacent subgrids. Samples of surface soil will be collected at the approximate center-point of each subgrid (1,2,3,4, etc.). Partial grids will be sampled and composited in five aliquots or lesser units for areas without five adjacent subgrids.

The soil samples will be collected from a 0-2-inch depth internal using a decontaminated trowel or appropriate disposable sampling device.

Each of the soil sample locations will be located using GPS equipment.

See Table ____ for asbestos in soil confirmation sampling program requirements and action limits and action.

5.4 Laboratory Analysis

The confirmatory grid area soil samples will be analyzed by Polarized Light Microscopy (PLM) for asbestos. The detailed analysis methods and procedures will follow NIOSH 9002.

Confirmatory Soil Analysis - NIOSH 9002 Method

5.5 Soil Sample Handling and Identification

This section provides a brief summary of the soil sample handling procedures and field custody procedures. See the QAPP for a detailed description of these procedures.

In general, a unique alphanumeric code will identify each sample collected during the sampling events. The coding system will provide a tracking record to allow retrieval